MAR 27 1985

Mr. T. E. Wehling
Senior Engineer
McDonnell Douglas Aircraft Company
P.O. Box 516
St. Louis, Missouri 63166

Dear Mr. Wehling:

This letter is to confirm a telephone conversation between Joe Galbraith of my staff and Harold Relhap of McDonnell Douglas on March 19, 1985, with regard to your letter to Robert Morby dated January 31, 1985. In our opinion 20 millimeter ammunition does not meet the classification of "Small Arms Ammunition" Class C Explosive. You must continue to manage the 20 millimeter ammunition as a RCRA regulated waste.

This opinion is consistent with the opinions of EPA Headquarters and the other EPA Regional Offices.

If you have any questions, please call Joe Galbraith at (816) 374-6531.

Sincerely yours,

Michael J. Sanderson Chief, RCRA Branch Waste Management Division

cc: Joe Davis, Missouri Dept. of

Natural Resources

bcc: Betty Willis, EPA HQ (WH-563)

Chet McLaughlin, STPR

PERM

WSTM:RCRA:PERM:JGalbraith:lmh:x6531:3-21-85:Disk 50/3

PERM Galbraith

Thraith Harringt

RCRA Sol Sanderson

R00136609 RCRA RECORDS CENTER



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

MAR 27 1985

Mr. T. E. Wehling
Senior Engineer
McDonnell Douglas Aircraft Company
P.O. Box 516
St. Louis, Missouri 63166

Dear Mr. Wehling:

This letter is to confirm a telephone conversation between Joe Galbraith of my staff and Harold Relhap of McDonnell Douglas on March 19, 1985, with regard to your letter to Robert Morby dated January 31, 1985. In our opinion 20 millimeter ammunition does not meet the classification of "Small Arms Ammunition" Class C Explosive. You must continue to manage the 20 millimeter ammunition as a RCRA regulated waste.

This opinion is consistent with the opinions of EPA Headquarters and the other EPA Regional Offices.

If you have any questions, please call Joe Galbraith at (816) 374-6531.

Sincerely yours,

Tymbell L. Harrington Michael J. Sanderson Chief, RCRA Branch

Waste Management Division

cc: Joe Davis, Missouri Dept. of Natural Resources